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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF ARIZONA**

15 State of Arizona, *ex rel.* Kristin K. Mayes,
16 Attorney General, *et al.*,

17 Plaintiffs,

18 v.

19 Michael D. Lansky, L.L.C., dba Avid
20 Telecom, *et al.*,

21 Defendants.

CASE NO.: 4:23-cv-00233-TUC-CKJ
(MAA)

[ORAL ARGUMENT REQUESTED]

**PLAINTIFFS' MOTION TO
COMPEL DEFENDANT MICHAEL
D. LANSKY, L.L.C., DBA AVID
TELECOM'S DOCUMENT
PRODUCTION IN RESPONSE TO
PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION
OF DOCUMENTS**

22 Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff States
23 (collectively, "Plaintiffs"), respectfully request the Court to order Defendant Michael D.
24 Lansky, L.L.C. dba Avid Telecom ("Avid Telecom") to provide requested documents that
25 it has failed to produce under Rule 34(b)(2)(B).

26 This Motion is supported by the following Memorandum of Points and Authorities,
27 the Declaration of Sarah Pelton and the exhibits attached thereto, any oral argument that
28

1 may be heard on this issue, all other pleadings and papers on file in this action, and any
 2 other evidence that may be presented to the Court.

3 4 **GOOD FAITH CONSULTATION CERTIFICATE**

5 In accordance with Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local
 6 Rule 7.2(j), undersigned counsel represents that prior to filing the instant Motion, Plaintiffs
 7 attempted multiple times, in writing and telephonically, to meet and confer with Defendant
 8 Avid Telecom’s counsel regarding its failure to produce documents in response to
 9 Plaintiffs’ Requests. Despite Plaintiffs’ good faith efforts, Defendant Avid Telecom has
 10 still failed to produce the requested documents in accordance with the Court’s ESI Order
 11 and Rule 34 of the Federal Rules of Civil Procedure. *See* Declaration of Sarah Pelton
 12 (“Pelton Decl.”), dated December 23, 2025 at ¶¶ 26-27, 35, Ex. Q. Accordingly, Plaintiffs
 13 were left with no alternative other than to file and serve this Motion.

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. INTRODUCTION**

16 Plaintiffs brought this lawsuit to protect consumers from Defendant Avid Telecom’s
 17 – and its co-defendants Michael D. Lansky’s (“Defendant Lansky”) and Stacey S. Reeves’
 18 (“Defendant Reeves”) – illegal telemarketing and robocall schemes. As set forth in the
 19 Complaint, Defendants Avid Telecom, Lansky and Reeves are in the business of providing
 20 Voice over Internet Protocol (“VoIP”) services, facilitating or initiating robocalls, and/or
 21 helping others make illegal robocalls – in violation of multiple state and federal laws.

22 On February 21, 2025, Plaintiffs served Defendant Avid Telecom with the Requests
 23 seeking production of relevant and admissible evidence in Avid Telecom’s possession
 24 related to Plaintiffs’ causes of action under the Telemarketing and Consumer Fraud and
 25 Abuse Prevention Act, the Telemarketing Sales Rules, the Telephone Consumer Protection
 26 Act, the Truth in Caller ID Act, as well as other state and federal laws, and Defendant Avid
 27 Telecom’s claimed defenses thereto. *See* Pelton Decl. at ¶ 3, Ex. A.

1 In violation of Rule 34, and despite multiple accommodations by Plaintiffs and the
2 Court to respond, Defendant Avid Telecom failed to produce any documents whatsoever
3 to Plaintiffs' Requests. *Id.* at ¶ 36.

4 Plaintiffs have met and conferred multiple times – in writing and telephonically –
5 to discuss concerns with Defendant Avid Telecom's lack of production and have made no
6 progress with defense counsel. Defendant Avid Telecom is unwilling to resolve disputes
7 regarding Plaintiffs' written discovery requests without judicial intervention.

8 Accordingly, Defendant Avid Telecom should be compelled to provide compliant
9 document production in response to Plaintiffs' Requests.

10 **II. RELEVANT FACTS**

11 On or around February 21, 2025, Plaintiffs served Defendant Avid Telecom with
12 the Requests pursuant to Rule 34 of the Federal Rules of Civil Procedure. *See* Pelton Decl.
13 at ¶ 3, Ex. A. The Requests sought relevant discovery regarding matters at the heart of the
14 Complaint and Defendant Avid Telecom's defenses thereto, namely documents concerning
15 Defendant Avid Telecom's business of facilitating, initiating, and/or helping others make
16 illegal robocalls; Defendant Avid Telecom's business records evidencing illegal
17 telemarketing and robocalling activity; Defendant Avid Telecom's purposeful failure to
18 implement any mitigating or corrective measures to prevent the perpetration of illegal
19 telemarketing and robocalling activity; and the monies and compensation Defendant Avid
20 Telecom earned through its illegal telemarketing and robocalling activity. *Id.* at Ex. A.

21 Pursuant to Rule 34(b)(2), Defendant Avid Telecom was required to provide
22 responses to Plaintiffs' Requests by March 24, 2025. *See* Fed. R. Civ. P. 34(b)(2) ("The
23 party to whom the request is directed must respond in writing within 30 days after being
24 served"). However, in violation of Rule 34(b)(2), Defendant Avid Telecom failed to
25 provide any responses by the March 24, 2025 statutory deadline. *See* Pelton Decl. at ¶¶ 4-5.

26 On or around March 26, 2025, Plaintiffs' counsel emailed defense counsel seeking
27 an update on the status of Defendant Avid Telecom's overdue responses. *See* Pelton Decl.
28

1 at ¶ 6, Ex. B. Defense counsel did not respond to Plaintiffs' March 26, 2025 email
2 correspondence. *Id.* at ¶ 7.

3 On or around March 31, 2025, Plaintiffs' counsel once again emailed defense
4 counsel requesting an update on Defendant Avid Telecom's overdue responses. *See* Pelton
5 Decl. at ¶ 8, Ex. C. That same day, defense counsel responded by apologizing for his "late
6 reply" and requesting an extension to April 30 in order to allow Defendant Avid Telecom
7 to "fully respond" to Plaintiffs' Requests". *Id.* at ¶ 9, Ex. D.

8 The parties subsequently stipulated to an April 30, 2025 deadline for Defendant
9 Avid Telecom to respond to Plaintiffs' Requests. *Id.* at ¶ 10, Ex. E.

10 On or around April 30, 2025, defense counsel emailed Plaintiffs' counsel
11 maintaining that they were "still working on the document responses" and that they were
12 "not sure we will be finished today, but [sic] am sure we will have them completed by
13 COB, Friday [May 2, 2025]." *See* Pelton Decl. at ¶ 11, Ex. F. However, on May 2, 2025,
14 Defendant Avid Telecom once again failed to provide any response to Plaintiffs'
15 Requests.¹

16 On or around May 7, 2025, Plaintiffs' counsel emailed defense counsel requesting
17 Defendant Avid Telecom's responses to Plaintiffs' Requests. *See* Pelton Decl. at ¶ 13, Ex.
18 I. Defense counsel did not respond to Plaintiffs' May 7, 2025 correspondence. *Id.* at ¶ 14.

19 After hearing nothing further from defense counsel, on or around May 16, 2025,
20 Plaintiffs' counsel sent a meet and confer email correspondence regarding Defendant Avid
21 Telecom's failure to respond to Plaintiffs' Requests. *See* Pelton Decl. at ¶ 15, Ex. J. Once
22 again, defense counsel failed to respond to Plaintiffs' correspondence. *Id.* at ¶ 16.

23 On or around May 27, 2025, Plaintiffs' counsel again emailed defense counsel
24 seeking his availability for a meet and confer regarding Defendant Avid Telecom's failure
25 to respond to Plaintiffs' Requests. Pelton Decl. at ¶ 17, Ex. K. The following day, defense
26

27 ¹ On May 2, 2025, defense counsel served three copies of Defendant Lansky's responses
28 to Plaintiffs' Requests via email. However, responses from Defendants Avid Telecom and
Reeves were not included in this email. *See* Pelton Decl. at ¶ 12, Exs. G-H.

1 counsel emailed Plaintiffs' counsel and stated that he would try to have a "substantive
2 response for you later today or tomorrow." *Id.* at ¶ 18, Ex. L. However, defense counsel
3 never responded to Plaintiffs' meet and confer correspondences. *Id.* at ¶ 19. Eventually,
4 defense counsel sent Plaintiffs "supplemental" responses for Defendant Avid Telecom on
5 July 22, 2025. *Id.* ¶ 30, Exs. S-T.

6 On or around June 19, 2025, Plaintiffs notified the Court of the dispute regarding
7 Defendant Avid Telecom's failure to response to Plaintiffs' First Set of Requests for
8 Production. Pelton Decl. at ¶ 20. The Court later instructed the parties to meet and confer
9 by June 27, 2025. *Id.* at Ex. M. On or around June 20, 2025, Plaintiffs' counsel emailed
10 defense counsel to schedule a meet and confer. *Id.* at ¶ 21, Ex. N. Defense counsel did not
11 respond to Plaintiffs' correspondence. *Id.* at ¶ 22.

12 On or around June 30, 2025, Plaintiffs notified the Court of defense counsel's failure
13 to even provide dates of availability to schedule a meet and confer regarding Plaintiffs'
14 disputes. *Id.* at ¶ 23. In a July 1, 2025 Order (Dkt. #118), the Court instructed the parties to
15 meet and confer on or before July 11, 2025. *Id.* at ¶ 24, Ex. O.

16 On or around July 2, 2025, Plaintiffs emailed defense counsel asking for availability
17 for a meet and confer. The parties scheduled a meet and confer for the following week.
18 Pelton Decl. at ¶ 25, Ex. P.

19 During the July 9, 2025 meet and confer and in follow-up emails between the
20 parties, defense counsel agreed to provide Defendant Avid Telecom's first written
21 responses and inform Plaintiffs when document production could be expected. *Id.* at ¶ 26-
22 27, Ex. Q. Defense counsel failed to do either by their respective deadlines. *Id.* at ¶ 28.

23 Defense counsel later acknowledged that three identical Responses were served for
24 all Defendants. *Id.* at ¶ 29, Ex. R. On or around July 22, 2025, defense counsel sent Avid
25 Telecom's supplemental responses to Plaintiffs' First RFPs. *Id.* at ¶ 30, Exs. S-T.

26 As Plaintiffs' disputes regarding Defendant Avid Telecom's deficient Responses
27 and lack of production remained unresolved, Plaintiffs contacted the Court to request that
28 discovery disputes be referred to a Magistrate. *Id.* at ¶ 31, Ex. U. In its August 11, 2025

1 Order (Dkt. #126), the Court set a briefing schedule to allow the parties to present their
2 discovery disputes.

3 On or around August 27, 2025, Plaintiffs filed their opening brief on discovery
4 disputes to the Court. Briefing concluded on or around September 9, 2025. Consequently,
5 the Court authorized Magistrate Judge Ambri to resolve future discovery matters between
6 the parties. *See* Dkt. #159. Later, Judge Ambri entered an Order that, among other things,
7 required Defendants to respond to Plaintiffs' First Set of Requests for Production of
8 Documents and comply with the Court's ESI Order by November 28, 2025. *See* Dkt. #169,
9 Pelton Decl. at Ex. V. The November 28 deadline came and passed with no document
10 production from Defendant Avid Telecom. *See* Pelton Decl. at ¶ 32.

11 On or around December 3, 2025, Plaintiffs emailed defense counsel informing them
12 that Defendants had not met the Court's deadline. *Id.* at ¶ 33, Ex. W. Defense counsel did
13 not respond. *Id.* at ¶ 34.

14 On or around December 9, 2025, the parties participated in a meet and confer.
15 During the meeting, Plaintiffs raised the issue of Defendant Avid Telecom's nonexistent
16 document production. *Id.* at ¶ 35. To date, Defendant Avid Telecom has still not made a
17 production of documents. *Id.* at ¶ 36.

18 Accordingly, left with no other alternative, Plaintiff States were forced to file and
19 serve the instant motion.

20 **III. ARGUMENT**

21 Good cause exists to compel Defendant Avid Telecom's compliance with its
22 discovery obligations. Pursuant to Rule 34 of the Federal Rules of Civil Procedure, a
23 responding party stating that it will produce documents, must produce responsive
24 documents in its possession, custody and control by no later than the time specified in the
25 requests for production or another reasonable time specified in the response. *See* Fed. R.
26 Civ. P. 34(b)(2)(B).

27 In its July 2025 Supplemental Responses, Defendant Avid Telecom repeatedly
28 asserted that it would "produce any non-privileged, responsive documents in Defendant's

1 possession, custody or control that are located through a reasonable search of Avid
2 Telecom's files." Pelton Decl. at ¶ 30, Ex. T. Likewise, in their September 2025 responsive
3 discovery brief, Defendant Avid Telecom stated it is not withholding any documents from
4 production. *See* Dkt. #148 at p. 4, n. 3.

5 It is now December 23, 2025, and in violation of Rule 34(b)(2)(B), Defendant Avid
6 Telecom has failed to produce any responsive documents to Request Nos 2-24, 27-39, 41-
7 42, 44-45, 48-55, 57-60, 64 subsection j, 66, 72, 76, 92-95, 98. Plaintiffs have brought this
8 issue to defense counsel - both in writing and telephonically – multiple times to no avail.
9 *See* Pelton Decl. at ¶¶ 26-27, 35, Ex. Q.

10 Given the significant delay caused by Defendant Avid Telecom's complete lack of
11 document production, Plaintiffs respectfully request the court to order Defendant Avid
12 Telecom to make an immediate ESI-Order-compliant document production on all of the
13 above-mentioned requests.

14 **IV. CONCLUSION**

15 For the reasons set forth above, Plaintiffs respectfully request the Court to order
16 Defendant Avid Telecom to provide ESI Order-compliant document production to
17 Plaintiffs' First Set of Requests for Production of Documents.

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1 RESPECTFULLY SUBMITTED this 7th day of January, 2026.

2
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CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2026, I caused the foregoing **PLAINTIFFS' MOTION TO COMPEL DEFENDANT MICHAEL D. LANSKY, L.L.C., DBA AVID TELECOM'S DOCUMENT PRODUCTION IN RESPONSE TO PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** to be filed and served electronically via the Court's CM/ECF system upon counsel of record.

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